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Attorney for Defendant
Samuel Rayburn

IN THE UNITED STATES DISTRICT COURT
OF THE
NORTHERN MARIANA ISLANDS

UNITED STATES OF AMERICA,
Plaintiff,

v.

SAMUEL RAYBURN,
Defendant.

Criminal Case No. 07-00019

**EX PARTE MOTION TO INCUR
ADDITIONAL EXPENSES FOR
INVESTIGATOR**

Defendant SAMUEL RAYBURN, by and through Counsel Danilo T. Aguilar, hereby respectfully moves this Court to incur additional expenses for the private Investigator in the amount of \$600.00.

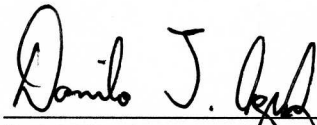
On June 26, 2007, this Court granted Defendant Rayburn's motion to hire an Investigator. The Investigator has already rendered over 20 hours @ \$45.00 / hour. The Investigator has located several potential witnesses for trial and his continued services are required to prepare these witnesses for trial and to assist counsel for trial. The proposed motion is supported by the attached declaration of counsel.

1 This matter is set for trial on September 10, 2007. Defendant's
2 counsel avers and justifies to this Court that the need to incur additional expenses
3 for investigator is necessary because of the limited time.

4 In order for Counsel to adequately defend Mr. Rayburn in this
5 upcoming Jury Trial, additional expenses for investigator is needed to assist
6 counsel. However, Ms. Rayburn does not have the necessary funds to incur
7 additional expenses for investigator. Mr. Rayburn should be able to go into trial
8 with a proper defense without regard to his financial situation.

9 For the foregoing reasons, Mr. Rayburn respectfully requests that this
10 Court grant his motion and allow him to incur an additional expenses of at least
11 \$600.00 for private investigator.

12 Respectfully submitted this 21st day of August, 2007.

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16 **DANILO T. AGUILAR, F0198**
17 Attorney for Defendant
18 Samuel Rayburn
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**DECLARATION OF COUNSEL IN
SUPPORT OF EX PARTE
MOTION TO INCUR
ADDITIONAL EXPENSES FOR
INVESTIGATOR**

I, DANILO T. AGUILAR, hereby declare as follows:

1. I am a duly licensed attorney and I am admitted to
practice before all courts of the CNMI;

2. I am counsel for the named Plaintiff in the above-entitled
matter;

3. On or about June 26, 2007, this Court granted Defendant
Rayburn's motion to hire an Investigator.

4. From the time the motion has been granted up to this date,
the hired private Investigator has already rendered over 20 hours @ \$45.00 / hour.

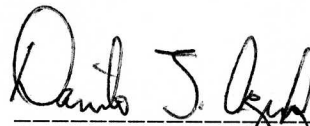
1 The Investigator has located several potential witnesses for trial and his continued
2 services are required to prepare these witnesses for trial and to assist counsel for
3 trial.

4
5 5. Counsel for Defendant requests for authorization to incur
6 an additional \$600.00 for private investigator fees up until the end of trial.

7
8 I declare under penalty of perjury under the laws of the United
9 States of America that the foregoing is true and correct, and to the best of my
10 knowledge.

11 Declarant sayeth naught.

12 Executed this 21st day August 2007 at Saipan, CNMI.

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16 DANILO T. AGUILAR
17 Declarant
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